

Stay safe together while staying two metres apart

Dr Shane Farrelly MFOM Occupational Health Specialist

COVID-19- Return to Work Protocol

Hierarchy of controls-Principles Overview

Occupational safety and health professionals use a framework called the “hierarchy of controls” to select ways of controlling workplace hazards. In other words, the best way to control a hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure. During a COVID-19 outbreak, when it may not be possible to eliminate the hazard, the most effective protection measures are (listed from most effective to least effective): engineering controls, administrative controls, safe work practices (a type of administrative control), and PPE. There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect workers from exposure to SARS-CoV-2.

In addition to the types of workplace controls discussed below, CDC guidance for businesses provides employers and workers with recommended SARS-CoV-2 infection prevention strategies to implement in workplaces: www.cdc.gov/coronavirus/2019ncov/specific-groups/guidance-business-response.html.

Engineering Controls

Engineering controls involve isolating employees from work related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement. Engineering controls for SARS-CoV-2 include:

Installing high-efficiency air filters.

Increasing ventilation rates in the work environment.

Installing physical barriers, such as clear plastic sneeze guards.

Installing a drive-through window for customer service.

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Specialized negative pressure ventilation in some settings, such as for aerosol generating procedures (e.g., airborne infection isolation rooms in healthcare settings and specialized autopsy suites in mortuary settings).

Administrative Controls

Administrative controls require action by the worker or employer. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard.

Examples of administrative controls for SARS-CoV-2 include:

Encouraging sick workers to stay at home.

Minimizing contact among workers, clients, and customers by replacing face-to-face meetings with virtual communications and implementing telework if feasible.

Establishing alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week.

Discontinuing nonessential travel to locations with ongoing COVID-19 outbreaks. Regularly check CDC travel warning levels at: www.cdc.gov/coronavirus/2019-ncov/travelers.

Developing emergency communications plans, including a forum for answering workers' concerns and internet-based communications, if feasible.

Providing workers with up-to-date education and training on COVID-19 risk factors and protective behaviors (e.g., cough etiquette and care of PPE).

Training workers who need to use protecting clothing and equipment how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties. Training material should be easy to understand and available in the appropriate language and literacy level for all workers.

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Safe Work Practices

Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard. Examples of safe work practices for SARS-CoV-2 include:

- Providing resources and a work environment that promotes personal hygiene. For example, provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60 percent alcohol, disinfectants, and disposable towels for workers to clean their work surfaces.
- Requiring regular hand washing or using of alcohol-based hand rubs. Workers should always wash hands when they are visibly soiled and after removing any PPE.
- Post handwashing signs in restrooms
- Ensuring social distancing possible in elevators/canteens and washrooms

Personal Protective Equipment (PPE)

While engineering and administrative controls are considered more effective in minimizing exposure to SARS-CoV-2, PPE may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies.

Examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection, when appropriate. During an outbreak of an infectious disease, such as COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19. Employers should check the [OSHA](#) and [CDC](#) websites regularly for updates about recommended PPE.

All types of PPE must be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted, as applicable (e.g., respirators).
- Consistently and properly worn when required.
- Regularly inspected, maintained, and replaced, as necessary.

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- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required during a COVID-19 outbreak will be based on the risk of being infected with SARS-CoV-2 while working and job tasks that may lead to exposure.

Specific Recommendations

Develop an Infectious Disease Preparedness and Response Plan

Plans should consider and address the level(s) of risk associated with various worksites and job tasks workers perform at those sites.

Where, how, and to what sources of SARS-CoV-2 might workers be exposed, including:

- The general public, customers, and coworkers;
- Sick individuals or those at particularly high risk of infection (e.g., international travelers who have visited locations with widespread sustained (ongoing) COVID-19 transmission
- healthcare workers who have had unprotected exposures to COVID-19

Workers' individual risk factors (e.g., older age; presence of chronic medical conditions, including immunocompromising conditions; pregnancy).

Controls are necessary to address those risks as per the Hierarchy of Controls as referenced earlier.

Employers' Duty of Care

Businesses and organisations have an important part to play in reducing the rate of transmission of COVID-19 in the workplace and in the community. Minimising the exposure to COVID-19 in the workplace and early intervention for suspected cases will complement public health measures while reducing disruption to business.

Prioritising the health and wellbeing of workers and their families

- The health of workers, their families and the general public is paramount to the COVID-19 pandemic response.

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- However, it is important that businesses clearly understand their role (if any) in the provision of essential services and clarify risks arising for workers and how they will be mitigated.

Showing leadership

- The responsibility for each workplace's COVID-19 response should rest at the highest level of the organisation, on the same terms as their other duty of care obligations.
- It also requires clear senior leadership in both the Human Resources (HR) and Communication functions of the organisation.
- Exercising that responsibility and leadership will entail applying timely and accurate health advice from trusted sources such as those listed at the end of this document for an extended period (at least six months).

Effective two-way communication between employers and workers

- Workers need information and direction regarding actions their employer is taking to safeguard their health, while employers need to be aware of their employees' workplace and related domestic concerns (for example: Childcare, other caring responsibilities).
- Employers need to be aware that business as usual may not be possible during this time and workers and employers need to work collaboratively and think outside of normal practices to solve some of the problems that are going to arise. HR managers need to be actively involved in working to identify solutions that work for the business's particular circumstances to maintain business continuity as far as feasible.
- The rapid evolution of health advice means that maintaining two-way communication between employers and workers will be an ongoing and dynamic process for an extended period.
- It is essential that employers do not expect that their workers will have necessarily understood the key messages from official sources. Workers may be confused by conflicting and perhaps false social media advice. This means employers should reinforce key messages from official sources at work.
- Communication and workplace policy and processes should acknowledge the potential for workers' mental health and wellbeing to be affected during the pandemic. This may include, but is not limited to, factors such as employment uncertainty, economic impacts, misinformation, and fear. Occupational health will provide specific advice on how to look after mental health during the coronavirus outbreak through podcasts.
- Whilst acknowledging that the current situation presents its unique challenges, it is important for employers to maintain privacy and confidentiality in sensitive communications with employees.

Showing empathy and compassion

- The actual level of threat posed by COVID-19, combined with uncertainty and misinformation, has led to many workers being in a state of fear.
- It is essential that employers recognise that workers and their families may be coping with many different situations, which may include the threat to their elderly and other at-risk loved ones, school closures, childcare issues, coping with caring for family members should they become ill, and even bereavement following deaths at home or among their workmates.

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- It will be essential during the pandemic that workers know that their employer continues to care for their personal circumstances and wellbeing: the challenge will be doing so without being unnecessarily intrusive and ensuring that privacy and confidentiality are maintained.

Applying innovative thinking

- The key strategies being applied on the advice of the Government are social and physical distancing (for example, limiting contact between people, and prohibiting gatherings of people as well as enhanced hygiene protocols such as handwashing and enhanced cleaning of desks, telephones and keyboards) and self-isolation (i.e. staying at home only with people who usually live in the home, not going to public places including work, school, childcare, university or public gatherings and not seeing visitors).
- Employers should consider applying innovative solutions that comply with the most current official advice, so that workers can continue to undertake their work roles as far as feasible whilst limiting contact with their colleagues and the general public as much as possible.
- This will be especially important for workplaces where options such as flexible working hours, working from home, or creative use of technology are not safe or feasible.
- For those workplaces where working from home is possible, employers need to provide adequate advice and support to their employees to enable them to set up ergonomic and properly equipped workspaces at home as far as feasible. Employers will also need to acknowledge that depending on employees' personal circumstances, working from home may impact on productivity and there may be an increased need for flexibility in working arrangements. It may be useful to develop a work from home health & safety checklist and specifically include advice on the potential mental health impacts of isolation and advice on how to manage a team in a virtual environment.
- Examples where innovative thinking may be required pertains to the practical implementation of key control measures such as hand washing, use of sanitisers, no hand shaking, creative use of office space, only using tap and pay to avoid handling cash, and avoiding 'clusters' of people at work.

Being responsive to the evolving situation

- As the information on the COVID-19 pandemic will continue to evolve rapidly, the organisation's senior leadership should assign specific responsibility to a dedicated individual or working group to regularly monitor the nation-specific advice from trusted official sources.
- It is recommended that the application of the information as it evolves should be based on occupational health and safety [hierarchy of controls](#), as for any other workplace hazard, as far as possible using existing policies and processes.
- As specialist doctors in the health and wellbeing of workers and the working age population more broadly, occupational physicians are well placed to assist. For example, reviewing each employer's COVID-19 response will often be very useful in helping to provide employers with targeted workplace-specific advice.

Planning ahead

- Businesses need to continue to ensure the health and safety of their workers in this changing environment as we anticipate this disruption will last for a significant period.
- While this pandemic is an example of widespread disruption, people around the world are already starting to identify new ways of doing business, and new ways of working.

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- Employers need to focus on what their future business might look like, and how to ensure that, together with their workers and the nation more broadly, they can survive and thrive once the pandemic ends.

Telemedicine consultations from occupational physicians

Use of video conference consultations with occupational health should be encouraged

1. To provide clarification of fitness for employee to RTW post COVID-19 exposure if case complex.
2. To provide support if a mental health concern is observed
3. To provide guidance to HR with complex cases
4. Normal Absence Management Support

It is important to access timely and accurate health advice from trusted sources such as those listed below:

Trusted sources of information on COVID-19

Advice on looking after mental health during the coronavirus outbreak

<https://www2.hse.ie/wellbeing/mental-health/covid-19/minding-your-mental-health-during-the-coronavirus-outbreak.html>

<https://www.mind.org.uk/information-support/coronavirus/coronavirus-and-your-wellbeing/>

Covid-19: Advice for Employers and Employees -HSA

https://www.hsa.ie/eng/topics/covid-19/covid-19_advice_for_employers_and_employees/

COVID-19: Advice for Irish Employers -CIPD

<https://www.cipd.ie/news-resources/practical-guidance/employment-law/factsheets/coronavirus-advice-irish>

COVID-19: Advice for Irish Employers -IBEC

<https://www.ibec.ie/employer-hub/covid-19>

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COVID-19: Guidance for Gradual Return to Work-CIF

<https://cif.ie/2020/04/27/the-cif-key-guidance-notes-for-the-construction-sector/>

COVID-19: guidance for employees, employers and businesses-UK

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19>

COVID-19: Advise for UK Employers

<https://www.cipd.co.uk/knowledge/fundamentals/emp-law/health-safety/coronavirus-factsheet>

Road Map for Ireland to Reopen Society and Business

<https://www.gov.ie/en/press-release/e5e599-government-publishes-roadmap-to-ease-covid-19-restrictions-and-reopen/>

COVID-19-Gov.ie

<https://www.gov.ie/en/campaigns/c36c85-covid-19-coronavirus/>

COVID-19-Gov.uk

<https://www.gov.uk/coronavirus>

The World Health Organization (WHO)

Coronavirus disease (COVID-19) outbreak webpage:

<https://www.who.int/emergencies/diseases/novel-coronavirus2019>

Information sheet – Getting your workplace ready for COVID-19:

https://www.who.int/docs/defaultsource/coronaviruse/getting-workplace-ready-for-COVID-19.pdf?sfvrsn=359a81e7_6

U.S. Department of Labor Occupational Safety and Health Administration – Guidance on Preparing Workplaces for COVID-19

Although US-centric, this document includes guiding principles which can be helpful to Ireland and the United Kingdom

https://www.osha.gov/Publications/OSHA3990.pdf?deliveryName=USCDC-10_4DM23416&deliveryName=FCP_2_USCDC-10_4-DM23416

Current status of the COVID-19 pandemic

The John Hopkins University provides a real-time world-wide status for the pandemic at

<https://coronavirus.jhu.edu/map.html>.

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